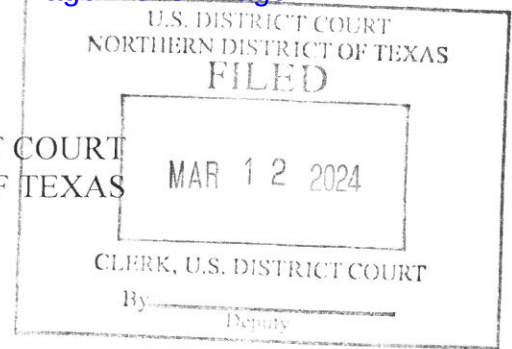


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:24-MJ-186

STEPHEN WAYNE ASHLEY, JR. (01)

**CRIMINAL COMPLAINT**

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about February 11, 2022, in the Fort Worth Division of the Northern District of Texas, **Stephen Wayne Ashley, Jr.**, the defendant, did use, persuade, induce, and entice a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer. Specifically, using a cellular telephone, **Ashley** produced the following visual depiction of a minor engaged in sexually explicit conduct:

File Name	File Description
20220211_215946_3.gif	This video depicts minor victim one, MV1, a pre-pubescent female, engaging in oral sexual intercourse on the penis of an adult male.

In violation of 18 U.S.C. § 2251(a).

I further state I am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI), and this complaint is based on the following facts gathered through an investigation I have conducted, my training and experience, and information provided to me by other law enforcement officers.

### **INTRODUCTION**

1. I have been employed as a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI) since August 2008. I am a graduate of the Criminal Investigator Training Program and the U.S. Immigration and Customs Enforcement Special Agent Training Academy. As a result of my employment with HSI, my duties include, but are not limited to, the investigation and enforcement of Titles 8, 18, 19, 21 and 31 of the United States Code. I am an “investigative or law enforcement officer of the United States” within the meaning defined in 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses.

2. I am currently assigned to the HSI Dallas Field Office, Child Exploitation Group, where I investigate criminal violations relating to the sexual exploitation of children, including the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. Based on my training and experience, I am aware that it is a violation of 18 U.S.C. § 2252(a)(1) for an individual to possess any visual depiction using any means or facility of interstate commerce, knowing the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

### **OVERVIEW OF INVESTIGATION**

3. In December 2022, New South Wales Police in Australia (NSWP) initiated an investigation targeting an individual who shared Mega links that contained child pornography on Twitter (now known as “X”).

This investigation identified one such Mega link contained approximately 1,699 media files, most of which depicted child pornography. Through the investigation multiple accounts, phone records and financial accounts were found connected to this Mega account that contained child pornography. All the accounts were linked to **Stephen Wayne Ashley, Jr. ("Ashley")** of 525 Smart Strike Trail, Granbury, Texas along with a Samsung S-22 cell phone.

4. On March 11, 2024, a federal search warrant was served at the **Ashley** residence by HSI Dallas and HSI Task Force Officers (TFO's). During the search of the residence, multiple electronic items were found, including a Samsung S-22 cell phone belonging to **Ashley**.

5. **Ashley** was advised of his *Miranda* rights, and he agreed to speak with agents. **Ashley** admitted transporting child pornography through the Mega cloud service and producing child pornography.

6. **Ashley** stated he made videos and pictures of minor victim one (MV1) in which he caused MV1 to perform oral sex on him and touch his genitals. **Ashley** said he also created depictions in which he touched MV1's genitals. **Ashley** stated he began producing the pictures/videos of MV1 in 2020, when MV1 was approximately 7 years of age. **Ashley** stated the files could be found in a secure folder on his old Samsung S-22 phone, which was located inside the house.

7. HSI agents located the Samsung S-22 cell phone and the secure folder described by **Ashley**. A preliminary review of the files showed several photographs and videos of MV1 engaged sexually explicit conduct with an adult male.

One such file, “20220211\_215946\_3.gif,” is a video file depicting MV1, a prepubescent minor, engaged in oral sexual intercourse on an adult male’s penis. In some of the sexually explicit depictions located on the phone, a blue blanket with a distinct pattern is observed next to MV1. During the search of the residence, the same blanket was found on the living room sofa.

8. The video of MV1, “20220211\_215946\_3.gif,” was found to contain EXIF<sup>1</sup> data that identified the date and time the image was produced. According to the EXIF data, the image was taken on February 11, 2022, at approximately 10:00 p.m. **Ashley’s** phone indicates that it was manufactured in Vietnam; therefore, the visual depiction referenced in paragraphs one and seven was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce.

*[Continued on next page]*

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<sup>1</sup> EXIF data (also sometimes referred to as metadata) contains information such as aperture, shutter speed, ISO, focal length, camera model, date the photo was taken and much more.



**CONCLUSION**

9. Based on the facts set forth in this affidavit, I respectfully submit there is probable cause to believe that on or about February 11, 2022, **Stephen Wayne Ashley, Jr.**, did use, persuade, induce, and entice a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2251(a).



Sean Dunagan, Special Agent  
Homeland Security Investigations

Sworn to before me and subscribed in my presence this 12<sup>TH</sup> day of March 2024, at 1:28 p.m. in Fort Worth, Texas.



HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE